IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

LULAC TEXAS; VOTO LATINO; TEXAS ALLIANCE FOR RETIRED AMERICANS; § TEXAS AFT, Plaintiffs,

Civil Action No: 1:21-cv-00786-XR v.

JOSE ESPARZA, in his official capacity as the Texas Deputy Secretary of State, et al.,

Defendants.

DEFENDANT LISA WISE'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Defendant Lisa Wise, in her official capacity as the El Paso County Elections Administrator, submits this Unopposed Motion for Extension of Time to Respond to the Complaint filed by Plaintiffs LULAC Texas, Voto Latino, Texas Alliance for Retired Americans, and Texas AFT (collectively, "Plaintiffs").

Plaintiffs filed their initial Complaint in this action (the "Complaint") on September 7, 2021. ECF No. 1. Defendant Lisa Wise was served with the Complaint on September 10, 2021, and the current deadline for her response to the Complaint is October 1, 2021. ECF No. 10.

Defendant Lisa Wise respectfully requests that the Court grant her a 30-day extension of time to file a response to the Complaint, up to and including November 1, 2021. Good cause exists for this extension because Defendant Lisa Wise's counsel require additional time to evaluate the Complaint, study the provisions of the recently-enacted legislation at-issue in this lawsuit, and to prepare a responsive pleading.

Pursuant to Local Rule CV-7(i), Defendant Lisa Wise's counsel have conferred with

Plaintiffs' counsel regarding the extension of time sought in this motion. Plaintiffs do not oppose this motion.

Accordingly, Defendant Lisa Wise requests that the Court enter an order granting her an extension of time to November 1, 2021 to file a response to Plaintiffs' Complaint.

Dated: September 24, 2021 Respectfully submitted,

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/s/ Orion Armon

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CERTIFICATE OF CONFERENCE

On September 22, 2021, counsel for Defendant Lisa Wise conferred by telephone with counsel for Plaintiffs and confirmed that Plaintiffs do not oppose this motion for extension of time to respond to the Complaint.

/s/ Orion Armon
ORION ARMON

CERTIFICATE OF SERVICE

I certify that on the 24th day of September, 2021, I electronically filed this document with the clerk of court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Orion Armon
ORION ARMON